

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 4:14-cr-153 ERW
)	
JAMES STALEY,)	
)	
Defendant.)	

GOVERNMENT'S OBJECTION TO DEFENDANT'S MOTION FOR CONTINUANCE

COMES NOW the United States of America, by and through its attorneys, Richard G. Callahan, United States Attorney for the Eastern District of Missouri, and Dianna R. Collins, an Assistant United States Attorney for said District, and objects to defendant's motion for continuance and states the following:

1. The government conferred with defense counsel prior to filing the defendant's first motion for continuance. During this conference, the undersigned worked with defense counsel to determine a date in August for sentencing in this matter that did not conflict with the Court's schedule, either of the attorney's schedules or the case agent's new appointment. As of August 26, the case agent will be moving to Virginia.

2. The government anticipates presenting victim testimony at sentencing. All of the victims are senior citizens and plan to attend the sentencing. The victims anticipated Mr. Staley's trial date which was continued several times. The victims are now anticipating the new sentencing date of August 19, 2015 and have already arranged travel plans to attend the

sentencing through the case agent. The victims should not have to wait in delay because of the defendant's vacation plans.

3. Candidly, the defendant's summer vacation should fall last in the weight of priorities in comparison to the Court's schedule, attorney schedules, case agent's schedule, and victim schedules. If the defendant wanted to participate in his family vacation, he could fly out on August 15th, return for his sentencing on the 19th, and then fly back out to rejoin his family. If the defendant believes it is an inconvenience to pause his vacation to attend his sentencing, he should be reminded that this Court could have remanded him immediately following his plea of guilty.

Respectfully submitted,

RICHARD G. CALLAHAN
United States Attorney

/s/Dianna R. Collins
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CERTIFICATE OF SERVICE

I hereby certify that on July 29, 2015, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the defense counsel of record.

/s/Dianna R. Collins
DIANNA R. COLLINS
Assistant United States Attorney

